

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

**UNITED STATES OF AMERICA,**

Plaintiff,

v.

**(1) DANIEL I. RAMIREZ,  
a.k.a. DANIEL I. RAMIREZ-MIRANDA,  
[DOB: 08-03-1999],**

and

**(2) VALERIE RIOS,  
[DOB: 12-18-1998],**

Defendants.

Case No. \_\_\_\_\_

**COUNT ONE**

*Conspiracy to Distribute Fentanyl*  
21 U.S.C. §§ 841(a)(1) and (b)(1)(C) and 846  
NMT 20 Years' Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years' Supervised Release  
Class C Felony

**COUNTS TWO AND FOUR**

*Distribution of Fentanyl*  
21 U.S.C. § 841(a)(1) and (b)(1)(C)  
NMT 20 Years' Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years' Supervised Release  
Class C Felony

**COUNTS THREE, FIVE, AND SEVEN**

*Distribution or Possession with Intent to  
Distribute Fentanyl within 1,000 Feet of a  
Public or Private School*  
21 U.S.C. §§ 841(a)(1) and 860(a)  
NLT 1 Year' Imprisonment  
NMT 40 Years' Imprisonment  
NMT \$2,000,000 Fine  
NLT 6 Years' Supervised Release  
Class B Felony

**COUNT SIX**

*Possession with Intent to Distribute Fentanyl*  
21 U.S.C. § 841(a)(1) and (b)(1)(C)  
NMT 20 Years' Imprisonment  
NMT \$1,000,000 Fine  
NLT 3 Years' Supervised Release  
Class C Felony

**COUNT EIGHT**

*Possession of a Firearm in Furtherance of a  
Drug Trafficking Crime*  
18 U.S.C. § 924(c)(1)(A)(i)

NLT 5 Years' Imprisonment  
(Consecutive to All Counts)  
NMT Life Imprisonment  
NMT \$250,000 Fine  
NMT 5 Years' Supervised Release  
Class A Felony

**FORFEITURE ALLEGATION**  
21 U.S.C. § 853

\$100 Special Assessment (Each Count)

**INDICTMENT**

**THE GRAND JURY CHARGES THAT:**

**COUNT ONE**

Beginning on an unknown date, but no later than on or about March 4, 2021, and continuing thereafter until the date of this indictment, said dates being approximate, in Clay County, in the Western District of Missouri, and elsewhere, the defendants, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA**, and **VALERIE RIOS**, knowingly and intentionally conspired and agreed with one another and others, unknown to the Grand Jury, to distribute a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C), all in violation of Title 21, United States Code, Section 846.

**COUNT TWO**

On or about March 4, 2021, in Clay County, in the Western District of Missouri, the defendant, **VALERIE RIOS**, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT THREE**

On or about March 4, 2021, in Clay County, in the Western District of Missouri, the defendant, **VALERIE RIOS**, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in or on, or within 1,000 feet of, the real property comprising a public or private elementary, vocational, or secondary school, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

**COUNT FOUR**

On or about March 9, 2021, in Clay County, in the Western District of Missouri, the defendant, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA**, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT FIVE**

On or about March 9, 2021, in Clay County, in the Western District of Missouri, the defendant, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA**, knowingly and intentionally distributed a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in or on, or within 1,000 feet of, the real property comprising a public or private elementary, vocational, or secondary school, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

**COUNT SIX**

On or about March 12, 2021, in Clay County, in the Western District of Missouri, the defendants, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA, and VALERIE RIOS**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

**COUNT SEVEN**

On or about March 12, 2021, in Clay County, in the Western District of Missouri, the defendants, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA, and VALERIE RIOS**, knowingly and intentionally possessed, with the intent to distribute, a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (“fentanyl”), a Schedule II controlled substance, in or on, or within 1,000 feet of, the real property comprising a public or private elementary, vocational, or secondary school, in violation of Title 21, United States Code, Sections 841(a)(1) and 860(a).

**COUNT EIGHT**

On or about March 12, 2021, in Clay County, in the Western District of Missouri, the defendants, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA, and VALERIE RIOS**, knowingly possessed a firearm, to wit, a Smith and Wesson brand, M&P Shield model, .45-caliber handgun bearing serial number HWT0706, in furtherance of conspiracy to distribute a mixture or substance containing a detectable amount of fentanyl, as charged in Count One; possession with the intent to distribute fentanyl, as charged in Count Six; and possession with the intent to distribute fentanyl within 1,000 feet of a public or private school, as charged in Count

Seven, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i); and *Pinkerton v. United States*, 328 U.S. 640 (1946) (coconspirator liability).

### **FORFEITURE ALLEGATION**

1. The allegations contained in Count One of this Indictment are realleged and incorporated by reference for the purpose of alleging a forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

2. Upon conviction of the controlled substance offense alleged in Count One of this Indictment, the defendants, **DANIEL I. RAMIREZ, a.k.a. DANIEL I. RAMIREZ-MIRANDA**, and **VALERIE RIOS**, shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count One of this Indictment, including, but not limited to the following: a money judgment in the amount of proceeds obtained directly and indirectly as a result of the defendants' participation in the drug conspiracy alleged in Count One.

### **SUBSTITUTE ASSETS**

If any of the property described above, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

**A TRUE BILL.**

*/s/ Kathleen Shaw*

**FOREPERSON OF THE GRAND JURY**

/s/ Byron H. Black

**BYRON H. BLACK**

Assistant United States Attorney

DATED: 4/30/2021

Kansas City, Missouri